AFFIDAVIT OF SGT. DET. DONALD KEENAN

I, Donald Keenan, being duly sworn, depose and state as follows:

1. I am a Sergeant Detective with the Boston Police Department ("BPD") where I have been employed for more than 12 years. I am currently the Supervisor of the Drug Control Unit ("DCU") in District D-4, which covers neighborhoods in the Back Bay, South End, Lower Roxbury, and Fenway areas of Boston.

2. During my tenure with the Boston Police Department, I have participated in investigations relating to the distribution of controlled substances including cocaine, cocaine base (also known as "crack cocaine"), heroin, marijuana, and other illegal drugs and have received training in the area of narcotics investigations. I have been the affiant on affidavits in support of search warrants, arrest warrants, and other applications.

3. This Affidavit is submitted in support of an application for a criminal complaint charging **JUSTIN SEARCY, A/K/A "JAY,"** with distribution of cocaine, a Schedule II controlled substance, within 1000 feet the real property comprising a public housing project, more particularly, the Lenox/Camden Housing Development in Boston, Massachusetts, (hereinafter collectively referred to as "the Lenox Street Housing Development"), in violation of Title 21, United States Code, Sections 841 and 860. On April 21, 2011, **SEARCY** sold cocaine to two undercover officers inside 18 Trotter

Court in the Lenox Street Housing Development located in Boston's South End.

4. I am familiar with and participated in the underlying investigation. I have also reviewed reports and spoken with the undercover officers who made the purchase from **SEARCY** and with other officers who assisted me in this investigation.

5. This affidavit does not set forth all the facts developed during the underlying investigation. Rather, it sets forth facts I believe to be sufficient to establish probable cause to believe that **SEARCY** committed the crime set forth in the accompanying Criminal Complaint.

6. For some time, members of the D-4 DCU have been attacking street-level drug trafficking in and around downtown areas of Boston and in the South End. Based on drug activity and the occurrence of violence associated with it, BPD undercover officers have been used to purchase street level amounts of drugs, (usually that form of cocaine known as cocaine base or "crack cocaine"), from area dealers including dealers working in and around the Lenox Street Housing Development.

7. Since approximately January, 2011, these activities have included longer-term investigations into drug dealing in and around the Lenox Street Housing Development. During the course of these various investigations, undercover officers were used to make purchases of cocaine (usually that form of cocaine known as cocaine base or crack cocaine) from area dealers. Because of the

ongoing nature of these operations, arrests were not made after individual buys but rather dealers were identified as buys took place in anticipation of arrests to be made at the conclusion of all current investigations in the Lenox Street area.

8. Activity in the Lenox Street Housing Development investigations took place on April 21, 2011 (among various other dates). At approximately 5:30 p.m. on April 21, two undercover officers ("UC-1" and "UC-2", hereinafter collectively referred to as "the UC's") were deployed in the area of Lenox Street Housing Development in the South End. Prior to being deployed, the UCs had been provided with a total of $70 in serialized BPD "Buy Money" with which to purchase drugs (UC-1 was given $30 and UC-2 was given $40). The UCs were also equipped with a video camera (without audio capability) and a non-recording audio transmitter. I had also deployed other officers from my unit in the area to conduct surveillance and for officer safety.

9. When the UCs got to the area of 2 Trotter Court inside the Lenox Street Housing Development, they encountered KIMBERLY COOPER pushing a baby stroller. The UCs had purchased cocaine from COOPER on March 18, 2011 in the course of earlier investigations.

10. When COOPER saw the UCs on April 21, she asked UC-1, "What do you need?" UC-1 told her that he/she wanted "Two for 30," which I know to be street terminology for two $20 rocks of crack cocaine for $30. In response, COOPER told UC-1 that she "Only had 1" but also said that if the UC's went to "222" and

rang the doorbell, she would "Call my girl and she will hook you guys up." When UC-2 asked where "222" was, COOPER pointed to the building at 18 Trotter Court located immediately adjacent to where they were.

11. The UCs then went to 18 Trotter Court, rang the doorbell, and were buzzed inside the building. When they got inside, the found **SEARCY** and a second male at the top of the stairs. The second male, (who was not identified), began running his hands around UC-2's waist and asked UC-2 if he was "a cop." As this male was questioning UC-2, UC-1 told **SEARCY**, "Your girl [a reference to COOPER], said she would call you and let you know we are coming." **SEARCY** told UC-1 she had and asked, "What do you need?"

12. UC-1 told **SEARCY** that he/she wanted "Two for 30." UC-2 also told **SEARCY** that he/she wanted two. **SEARCY** then opened a clear plastic bag containing smaller plastic bags of suspected crack cocaine.

13. UC-2 handed **SEARCY** $40. In exchange, **SEARCY** handed UC-2 two of the smaller plastic bags containing what was subsequently identified as crack cocaine. UC-1 then made a similar exchange with **SEARCY**, handing him $30 and getting back two plastic bags of crack.

14. As these exchanges were being made, UC-2 asked **SEARCY** whether there was a number at which UC-2 could call him. **SEARCY** told UC-2 to call 1-617-230-4430 and to store him in UC'2's cell

phone as "Jay."

15. The UC's thanked **SEARCY** and walked back out of 18 Trotter Street. As they left, KIMBERLY COOPER was coming in and accidentally dropped some money on the floor. UC-1 stopped, picked up the money, and handed it to COOPER. As UC-1 did so, COOPER told **SEARCY** "These guys are cool."

16. After the buy, the UC's met me and gave me the drugs they told me they had purchased from **SEARCY**. I field tested one of the rocks UC-1 had bought from **SEARCY** and it tested positive for cocaine. I then tested one of the rocks UC-2 bought from **SEARCY** and it tested positive for cocaine as well. The drugs were then logged into evidence and sent to the state laboratory for further testing. The identifications of **SEARCY** were also confirmed based on prior deals that the UC's had done with **SEARCY** and the video.

17. As set forth above, the April 21, 2011 purchase of cocaine by UC-1 and UC-2 from **JUSTIN SEARCY** took place in the hallway outside 18 Trotter Court, Apartment 222. This unit is inside the Lenox Street Development, a public housing development under 21 U.S.C. §860.

18. Based upon the foregoing, I submit there is probable cause to believe that, on April 21, 2011, **JUSTIN SEARCY, a/k/a "Jay,"** distributed cocaine, a Schedule II controlled substance, within 1000 feet the real property comprising a public housing project, more particularly, the Lenox/Camden Housing Development

in Boston, Massachusetts, in violation of Title 21, United States Code, Sections 841 and 860

Signed under the pains and penalties of perjury this 21 day of June, 2011.

SGT. DET. DONALD KEENAN

Sworn to and subscribed before me this 21 day of June, 2011.

MARIANNE B. BOWLER
UNITED STATES MAGISTRATE JUDGE